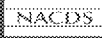


PSJ3

Exhibit 482

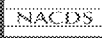


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NACDS Policy Council Meeting

**The Liaison Capitol Hill
Washington, DC
March 21, 2012**

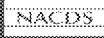
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Introductions and Review of Antitrust Statement

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STATUS UPDATES

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Medicaid Reimbursement

- Successful outcomes: CO, NE, NC, OK, SD
- Pending concerns: AL, CT, CO, IA, LA, MS, PA
- Managed care expansions: CA, KS, KY, TX

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Average Acquisition Cost (AAC)

- Implemented in 3 states: AL, ID, OR
- In process in 7 states:
 - CA: Enacted legislation in 2011; implementation late 2013
 - CO: Studies underway
 - IA: Discussions ongoing
 - LA: Studies completed
 - MD: Plan to use CMS NADAC; COD study completed
 - MS: COD study complete; New administration seeking broad authority
 - NY: Focus groups; Mid summer implementation goal
- Legislative proposal defeated in OK

Value of Pharmacy

Immunization Expansion

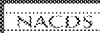
- Goals:

- Lower age restrictions
- Expand portfolio of vaccines
- Advocate for protocol vs. Rx

- Successful outcomes: FL, WV

- Pending: CT, DC, GA, HI, IL, LA, ME, MD, MA, NY, NC, PA

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Value of Pharmacy

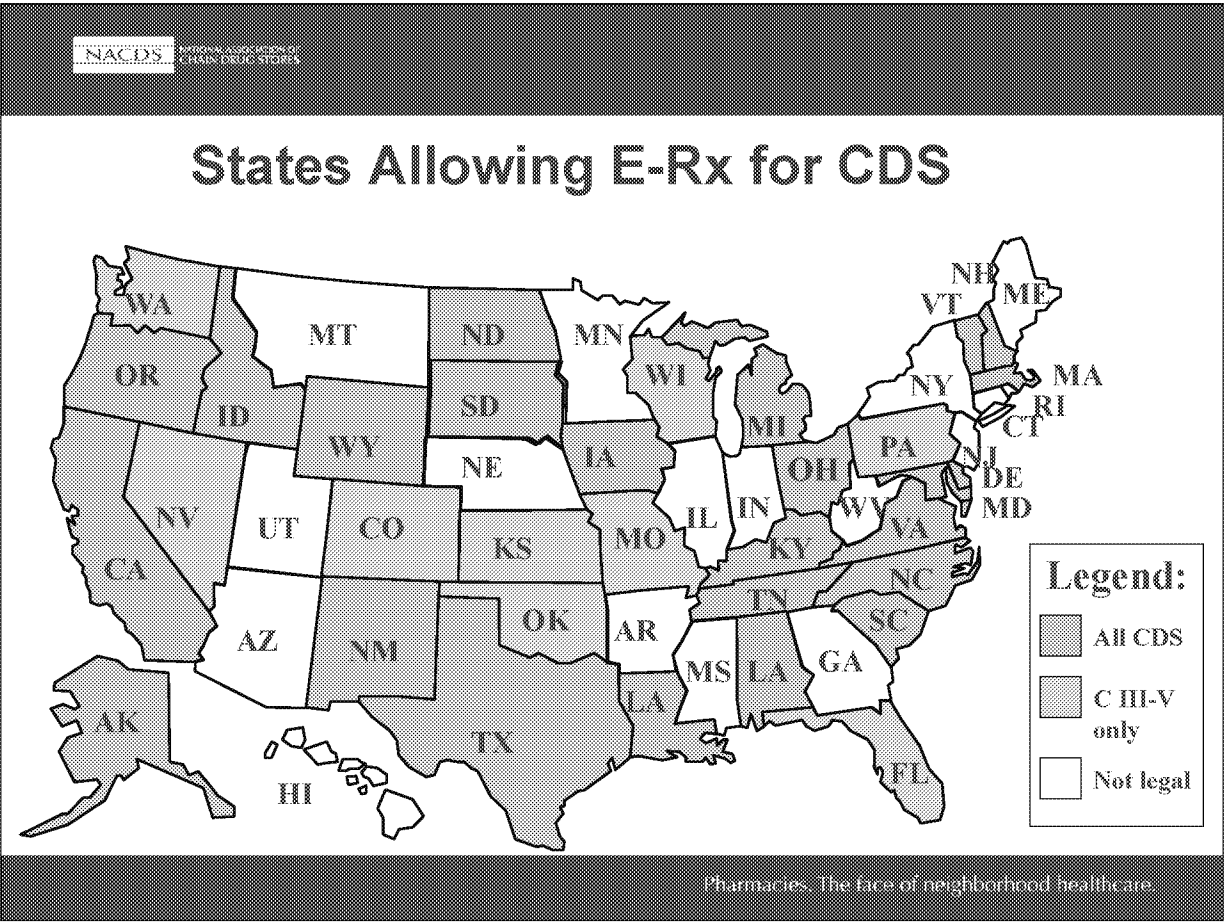
MTM

- Pending: IA, VA
- KY: MTM in Medicaid managed care RFP
- NC: implementation of pilot programs enacted in 2011

Collaborative Therapy

- Pending: DC

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EPCS

- EPCS is a legal practice in 33 states
 - 24 states permit electronic transmission of schedule II-V
 - 9 states permit electronic transmission of schedule III-V
- Pending Activities
 - Legislative activity: AZ; CO; FL; MN; OK; RI; WA; WI; WV
 - Regulatory activity: IL; NV; PA; TX

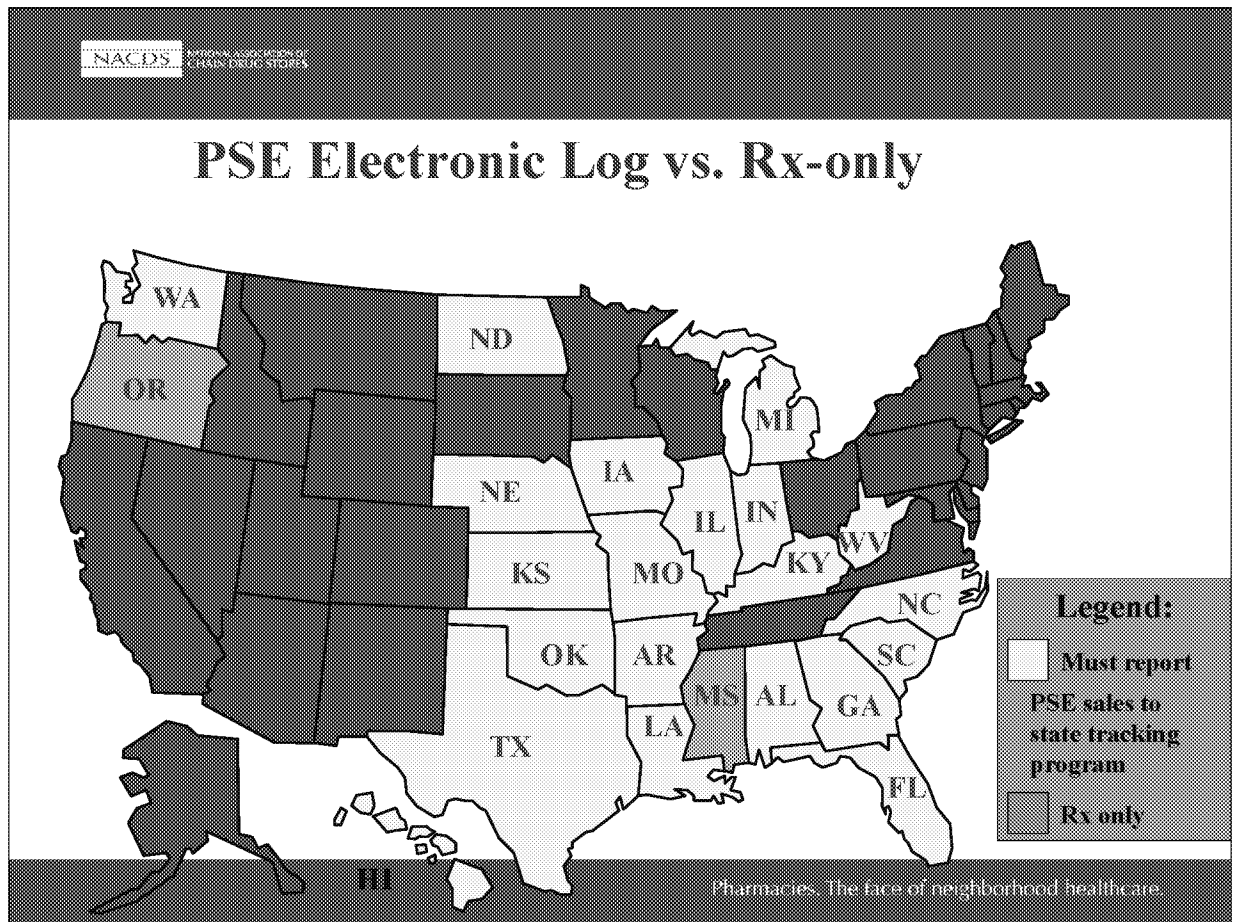
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e-P/A

•Legislation

- **Active: GA*; KY*; MD; MO*; NJ; NY; UT**
- **Other pending: MA; NE**
- **Dead: IL; OK; SC; TN**

•NCPDP has reactivated its “Prior Authorization Task Group” which continues to work on an e-P/A standard concurrently with ongoing industry pilots.



Pseudoephedrine

- State Trends: Rx only versus electronic logs
 - Rx only proposals:
 - Pending: AL, HI, KS, KY, LA, TN
 - Failed: FL, IN, OK*, WV
 - Electronic logbook proposals:
 - Pending: AL, AZ, CA, CO, HI, ID, KY, ME, MO, NJ, NY, OK, SC
 - Failed: NM
 - Passed: SD, VA, WV

* Potential for amends of Rx only language in another bill

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Biosimilar Carve-Outs

- Legislative language in 4 states in 2012:
 - CO; GA; IL; PA
- Will be the new trend in carve-outs in 2013
- NACDS will continue to work with our partners in the National Generic Carve-Out Coalition on this emerging issue

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Pharmaceutical Hazardous Waste

- Federal and State regulation = patchwork
- Federal law
 - Allows EPA authorization of states
 - Not pharmacy specific
 - Lists of hazardous waste (F,K, P, U)
- State may have different/more stringent requirements
- New Federal approach-Rx hazardous waste ?
 - Discussion
 - Change federal EPA law?



Drug Diversion / DEA

- **Concerns about: FL, pill mills, Internet, drug disposal**

- **NACDS Testifies at House E&C**

- Support for DEA & FDA
- Support PDMPs
- Support OPSA
- Anticipate DEA NPRM on Drug Disposal

- **House Judiciary Hearing**

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Drug Diversion / DEA

•DEA Final Rule for Fee Increase

–Effective April 16, 2012

–Pharmacy: ↑ \$60/year

–Now \$731/triennium

•Drug Disposal NPRM - Soon

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MTM Research

- Jointly funded with PhRMA
- Using Medicare data, examines targeting of MTM services
- Found that MTM targeting systematically excludes patients with suboptimal use of medications
- Paper submitted to Health Services Research with Dr. Bruce Stuart, U of Maryland

Immunization Research

- Research with Avalere
- Using CDC survey data on flu shot vaccination rates between 2002 and 2006
- 13% increase in the likelihood that a non-elderly adult receives a flu shot, and no change for those 65 and older
- Paper submitted to American Journal of Managed Care

AAC Research

- CMS recommended states move to acquisition cost basis
- Using CMS drug utilization data, compared AAC basis + COD to current reimbursement and AMP-based FULs
- AAC impacts both brand and generic products
- We anticipate dispensing fee changes with AAC

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Prescription Drug User Fee Act (PDUFA) Reauthorization

- Must be enacted by 9-30-2012
- Discussion Draft released
 - No track/trace
 - Pharmaceutical Supply Chain placeholder in Title VII
- Political outlook - track/trace in PDUFA

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Pharmaceutical Distribution Security Alliance PDSA

- Drug manufacturers, primary and secondary wholesalers, pharmacies, 3PLs, national associations
- Activities:
 - Conference calls & in person meetings
 - Initial Discussion Draft distributed to Hill
 - Congressional outreach to key committees
 - FDA meeting
 - California Board of Pharmacy meeting
- Next steps
 - Hill feedback/questions on Discussion Draft
 - Pursue NACDS desired changes

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Online Pharmacy Legislation

- Senate and House bills – gaining traction
 - S.2002, H.R. 4095
 - In PDSA Discussion Draft
- Non-regulatory approach
- Registry of legitimate online pharmacy websites
- Consumer education
- Safe harbor for Internet, financial entities, registrars and registries that use the list

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.pharmacy Top Level Domain Name

- Generic Top Level Domain (gTLD) Names
 - = letters *after the “dot”* e.g. .com
- ICANN – Internet Corporation for Assigned Names
 - Oversees Top Level Domain names
 - Accepting applications for *new* gTLDs
 - Limited application window: 1-12-12 to 4-12-12
- NABP applying for .pharmacy
 - Prevent illegal internet drug sellers from getting . pharmacy
 - NABP would be Registrar and limit .pharmacy to legitimate pharmacies

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USP Workshop on Supply Chain Integrity

- New Chapter <1083> Good Distribution Practices-
Supply Chain Integrity
 - http://www.usp.org/sites/default/files/usp_pdf/EN/USPNF/revisions/c1083.pdf
- May 22-23, 2012 – USP Rockville, MD
 - Topics/Speakers include NACDS, FDA track/trace update, California Board of Pharmacy, VA track/trace pilot
 - Agenda in meeting packet

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Pharmacy Notice of Appeal Rights

- Requirement to provide Notice of Appeal Rights to beneficiaries denied a claim
- Previously, requirement was met by visibly posting a Notice of Appeal rights in store
- NACDS submitted comments to two draft versions last year
- CMS incorporated many of the changes recommended by NACDS

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Pharmacy Notice of Appeal Rights

- Final version released on February 3, 2012.
- New requirement was effective on January 1, 2012, however, CMS will not take action against non-compliance until May 1, 2012.
- NACDS has been working with the Federal Programs Workgroup on this issue to seek clarification as implementation moves forward.

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TRICARE

- OFCCP – Federal Contractors/Subcontractors
 - Legislative clarification in FY2012 Defense Authorization
 - DOL Interpretation

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TRICARE

- FY2013 Defense Authorization
 - President's budget includes across the board increases to beneficiary cost sharing
 - Further efforts to drive mail order use
- NACDS-NCPA Legislative Proposal
 - Increased generic utilization, federal discounts
 - MTM Demo

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Federal Privacy

•Omnibus Final Rule - Soon

- Marketing
- Sale of PHI
- Notice of Privacy Practices
- Right to Request Restrictions
- Right to Access

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FDA

•Third Class of Drugs: “New Paradigm”

- Public Hearing March 22-23
- “Cautiously Optimistic”

•REMS

- TIRF REMS Effective March 12

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AMP Proposed Rule

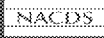
- Comments Due 4/2/12
- EAC/AAC
- Definition of Retail Community Pharmacy
- Nationwide Availability
- Smoothing/Indexing
- Not Generally Dispensed
- “No Less Than” 175%

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National Average Drug Acquisition Cost (NADAC)

- Complying With Paperwork Reduction Act
- Comments to Survey Materials Due 4/2/12
- Issues with Liability/Confidentiality Remain
- OMB Clearance Number Required
- 24 States Have Expressed Plans to Use

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MTM Legislation

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